United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5	3 DE0000299 11	12 120430 17	18 S	19 S	20 2

Remarks

21 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved	
67 69	70	71	72	73 74	75 80

Section B: Facility Data

Name and Location of Facility Inspected (*For industrial users discharging to POTW, also include POTW name and NPDES permit number*)	Entry Time/Date	Permit Effective Date
ALLEN HARIM FOODS, LLC P.O. BOX 63 18752 HARBESON RD. HARBESON, DE 19951	0920 hrs. 4-30-12	05-01-06
	Exit Time/Date	**Permit Expiration Date**
	1510 hrs. 4-30-12	04-30-11

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

MICHAEL R. SAUSE - CLEVEL IV - DEC

Other Facility Data (*e.g., SIC NAICS, and other descriptive information*)

Name, Address of Responsible Official/Title/Phone and Fax Number

SCOTT YACKEL - PLT. MGR.
SAME ADDRESS AS ABOVE
302-684-1640

Contacted ☐ Yes ☐ No

Section C: Areas Evaluated During Inspection (*Check only those areas evaluated*)

☑ Permit	☑ Self-Monitoring Program	☐ Pretreatment
☑ Records/Reports	☑ Compliance Schedules	☑ Pollution Prevention
☑ Facility Site Review	☑ Laboratory	☑ Storm Water
☑ Effluent/Receiving Waters	☑ Operations & Maintenance	☐ Combined Sewer Overflow
☑ Flow Measurement	☑ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow
		☐ MS4

Section D: Summary of Findings/Comments

(*Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary*)

SEV Codes	SEV Description
☐☐☐☐☐	
☐☐☐☐☐	
☐☐☐☐☐	
☐☐☐☐☐	

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
GLENN F. DAVIS [signature]	DNREC 302.739.9946	4/30/12
Nicole L Smith [signature]	DNREC 302-739-9946	4/30/12
Signature of Management Q A Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Robert Underwood [signature]	DNREC 302 739 9946	6/8/12

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

Form Approved
OMB No. 158-R0073

Sections F thru L: Complete on all inspections, as appropriate. N/A = Not Applicable

PERMIT NO. DE 0000299

SECTION F - Facility and Permit Background

ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY *(Including City, County and ZIP code)*

DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE: 4-27-11

FINDINGS: SEE REPORT FROM 4-27-11

SECTION G - Records and Reports

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ☑ YES ☐ NO ☐ N/A *(Further explanation attached _____)*

DETAILS:

(a) ADEQUATE RECORDS MAINTAINED OF:			
(i) SAMPLING DATE, TIME, EXACT LOCATION	☑ YES	☐ NO	☐ N/A
(ii) ANALYSES DATES, TIMES	☑ YES	☐ NO	☐ N/A
(iii) INDIVIDUAL PERFORMING ANALYSIS	☑ YES	☐ NO	☐ N/A
(iv) ANALYTICAL METHODS/TECHNIQUES USED	☑ YES	☐ NO	☐ N/A
(v) ANALYTICAL RESULTS *(e.g., consistent with self-monitoring report data)*	☑ YES	☐ NO	☐ N/A
(b) MONITORING RECORDS *(e.g.,flow, pH, D.O., etc.)* MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS *(e.g. continuous monitoring instrumentation, calibration and maintenance records)*.	☑ YES	☐ NO	☐ N/A
(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT.	☑ YES	☐ NO	☐ N/A
(d) FACILITY OPERATING RECORDS KEPT INCLUDING OPERATING LOGS FOR EACH TREATMENT UNIT.	☑ YES	☐ NO	☐ N/A
(e) QUALITY ASSURANCE RECORDS KEPT.	☑ YES	☐ NO	☐ N/A
(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES *(and their compliance status)* USING PUBLICLY OWNED TREATMENT WORKS.	☐ YES	☐ NO	☑ N/A

SECTION H - Permit Verification

INSPECTION OBSERVATIONS VERIFY THE PERMIT. ☐ YES ☐ NO ☐ N/A *(Further explanation attached _____)*

DETAILS:

(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.	☑ YES	☐ NO	☐ N/A
(b) FACILITY IS AS DESCRIBED IN PERMIT.	☑ YES	☐ NO	☐ N/A
(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION.	☑ YES	☐ NO	☐ N/A
(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION.	☑ YES	☐ NO	☐ N/A
(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES.	☐ YES	☐ NO	☑ N/A
(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED.	☐ YES	☑ NO	☐ N/A
(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT.	☑ YES	☐ NO	☐ N/A
(h) CORRECT NAME AND LOCATION OF RECEIVING WATERS.	☑ YES	☐ NO	☐ N/A
(i) ALL DISCHARGES ARE PERMITTED.	☑ YES	☐ NO	☐ N/A

SECTION I - Operation and Maintenance

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ☑ YES ☐ NO ☐ N/A *(Further explanation attached _____)*

DETAILS:

(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED. NO POWER NO FLOW	☐ YES	☑ NO	☐ N/A
(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	☑ YES	☐ NO	☐ N/A
(c) REPORTS ON ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT.	☐ YES	☐ NO	☑ N/A
(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED.	☑ YES	☐ NO	☐ N/A
(e) ALL TREATMENT UNITS IN SERVICE.	☑ YES	☐ NO	☐ N/A
(f) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS. BY CONV. // REED ON-SITE	☑ YES	☐ NO	☐ N/A
(g) QUALIFIED OPERATING STAFF PROVIDED.	☑ YES	☐ NO	☐ N/A
(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS. OJT, OTC.	☑ YES	☐ NO	☐ N/A
(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.	☑ YES	☐ NO	☐ N/A
(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT.	☑ YES	☐ NO	☐ N/A
(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED. * UPDATED 12/2011	☐ YES	☑ NO	☐ N/A
(l) SPCC PLAN AVAILABLE.	☑ YES	☐ NO	☐ N/A
(m) REGULATORY AGENCY NOTIFIED OF BY PASSING. *(Dates _____ _____)*	☐ YES	☐ NO	☑ N/A
(n) ANY BY-PASSING SINCE LAST INSPECTION.	☐ YES	☑ NO	☐ N/A
(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED.	☐ YES	☑ NO	☐ N/A

PERMIT NO. DE 0000299

SECTION J - Compliance Schedules

PERMITTEE IS MEETING COMPLIANCE SCHEDULE. ☐ YES ☑ NO ☐ N/A *(Further explanation attached _____)*

CHECK APPROPRIATE PHASE(S):

- ☐ (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION.
- ☐ (b) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING *(mortgage commitments, grants, etc.)*.
- ☐ (c) CONTRACTS FOR ENGINEERING SERVICES HAVE BEEN EXECUTED.
- ☐ (d) DESIGN PLANS AND SPECIFICATIONS HAVE BEEN COMPLETED.
- ☐ (e) CONSTRUCTION HAS COMMENCED.
- ☐ (f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE.
- ☐ (g) CONSTRUCTION HAS BEEN COMPLETED.
- ☐ (h) START-UP HAS COMMENCED.
- ☐ (i) THE PERMITTEE HAS REQUESTED AN EXTENSION OF TIME.

SECTION K - Self-Monitoring Program

Part 1 – Flow measurement *(Further explanation attached _____)*

PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. DETAILS:	☑ YES	☐ NO	☐ N/A
(a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED. w/ ULTRASONIC	☑ YES	☐ NO	☐ N/A
TYPE OF DEVICE: ☐ WEIR ☑ PARSHALL FLUME ☐ MAGMETER ☐ VENTURI METER ☐ OTHER *(Specify _____)*			
(b) CALIBRATION FREQUENCY ADEQUATE. *(Date of last calibration* 11-8-11 *)*	☑ YES	☐ NO	☐ N/A
(c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED.	☑ YES	☐ NO	☐ N/A
(d) SECONDARY INSTRUMENTS *(totalizers, recorders, etc.)* PROPERLY OPERATED AND MAINTAINED.	☑ YES	☐ NO	☐ N/A
(e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES.	☑ YES	☐ NO	☐ N/A

Part 2 – Sampling *(Further explanation attached _____)*

PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. DETAILS:	☑ YES	☐ NO	☐ N/A
(a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	☑ YES	☐ NO	☐ N/A
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT.	☑ YES	☐ NO	☐ N/A
(c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT. IF NO, ☐ GRAB ☐ MANUAL COMPOSITE ☐ AUTOMATIC COMPOSITE FREQUENCY _____	☑ YES	☐ NO	☐ N/A
(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE.	☑ YES	☐ NO	☐ N/A
(i) SAMPLES REFRIGERATED DURING COMPOSITING ICED	☑ YES	☐ NO	☐ N/A
(ii) PROPER PRESERVATION TECHNIQUES USED	☑ YES	☐ NO	☐ N/A
(iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT	☑ YES	☐ NO	☐ N/A
(iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3	☑ YES	☐ NO	☐ N/A
(e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT.	☑ YES	☐ NO	☐ N/A
(f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT.	☑ YES	☐ NO	☐ N/A

Part 3 – Laboratory *(Further explanation attached _____)*

PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT. DETAILS:	☑ YES	☐ NO	☐ N/A
(a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. *(40 CFR 136.3)*	☑ YES	☐ NO	☐ N/A
(b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED.	☐ YES	☐ NO	☑ N/A
(c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED. PROCESS CONTROL	☑ YES	☐ NO	☐ N/A
(d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. (CONTROL)	☑ YES	☐ NO	☐ N/A
(e) QUALITY CONTROL PROCEDURES USED.	☑ YES	☐ NO	☐ N/A
(f) DUPLICATE SAMPLES ARE ANALYZED. 25 % OF TIME. PH & TRC 5%	☑ YES	☐ NO	☐ N/A
(g) SPIKED SAMPLES ARE USED. 25 % OF TIME.	☑ YES	☐ NO	☐ N/A
(h) COMMERCIAL LABORATORY USED.	☑ YES	☐ NO	☐ N/A
(i) COMMERCIAL LABORATORY STATE CERTIFIED.	☐ YES	☐ NO	☑ N/A

LAB NAME ENVIRO CORP LAB

LAB ADDRESS HARRINGTON, DE

Form Approved
OMB No. 158.-R0073

PERMIT NO. DE0000299

SECTION L - Effluent/Receiving Water Observations *(Further explanation attached _____)*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER
004	NO	Flow					
003	NO	Flow					
002	NO	Flow					
001	NO	NO	NO	NO	NO	Clear	—

(Sections M and N: Complete as appropriate for sampling inspections)

SECTION M - Sampling Inspection Procedures and Observations *(Further explanation attached _____)*

- ☑ GRAB SAMPLES OBTAINED
- ☑ COMPOSITE OBTAINED
- ☑ FLOW PROPORTIONED SAMPLE
- ☐ AUTOMATIC SAMPLER USED
- ☑ SAMPLE SPLIT WITH PERMITTEE
- ☑ CHAIN OF CUSTODY EMPLOYED
- ☑ SAMPLE OBTAINED FROM FACILITY SAMPLING DEVICE

SAMPLED 5/2/12

COMPOSITING FREQUENCY Flow Prop. PRESERVATION ICED

SAMPLE REFRIGERATED DURING COMPOSITING: ☑ YES ☐ NO ICE

SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE Yes

SECTION N - Analytical Results *(Attach report if necessary)*

EPA Form 3560-3 (9-77)

WATER COMPLIANCE INSPECTION REPORT
STORM WATER EVALUATION
National Pollutant Discharge Elimination System Permitting Program
Delaware Department of Natural Resources and Environmental Control
Surface Water Discharges Section

Name and location of Facility Inspected ALLENS HARM FOODS, LLC HARRISON, DE	**Entry Date/Time** 4-30-12 0920hrs.
Facility Permit No. DE 0000299	
Facility Contact MICHAEL SAUSE	**Exit Date/Time** 4-30-12 1510hrs.

An evaluation of the facility's storm water management program was completed in order to determine whether or not the facility is operating in compliance with regards to the storm water permitting requirements of their NPDES permit. The evaluation consisted of a records review and a visual observation of the facility's storm water management system.

The facility is permitted to discharge storm water from Outfall(s) _____.

RECORDS REVIEW	Yes	No	S/C
1) **Storm Water Plan.** Has the facility developed and implemented a Storm Water Plan as required by Part III of their NPDES Permit? What is the date of the current SWP? DEC 2011	X		
2) **Training.** Training completed annually? Are all employees and contractor personnel that work in areas where industrial materials are used/stored trained to meet the requirements of the SWP?	X		
3) **Inspection Records.** Are storm water inspections conducted and documented? Please describe.	X		
4) **Monitoring Data.** Has the facility performed storm water monitoring as required by the permit? * DISCHARGE CAPTURED		X	
5) **Spill and Leaks.** Have any major spills or leaks occurred resulting in a discharge to the storm water conveyance system? If so, are records maintained indicating spills/leaks?			N/A

PHYSICAL INSPECTION	Yes	No	S/C
1) **Storm Water Outfalls.** Are storm water outfalls identified as required?	X		
Outfalls free of trash/ debris/erosion?	X		
Any non-storm water discharges occurring?		X	
2) **Storm Water Conveyance System.** Are catch basins, storm water conveyance systems and storm water treatment facilities cleaned at appropriate intervals? Is the storm water conveyance system free of trash and debris?	X		
3) **Good Housekeeping Practices.** Are outside areas kept neat and clean? Is process debris removed regularly?	X		
Is there evidence of leaks/spills?		X	
Is there evidence of particulate matter or visible deposits and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water discharge?		X	
4) **Storm Water Pollution:** materials being stored in a manner that minimizes their exposure to storm water?	X		

5) **Storm Water Visual Observations:** Are the following present in storm water discharges or do the outfalls indicate evidence thereof?

OUTFALL NUMBER	OIL SHEEN	VISIBLE FOAM	VISIBLE FLOATING SOLIDS	COLOR
001	NO	NO	NO	CLEAR
002, 003, 004		NO DISCHARGE		

COMMENTS

* 002 & 004 Storm water is captured and sent to onsite headworks for treatment.

Compliance Status At Time of Inspection: COMPLIANT

Reconnaissance Inspection Required: Yes or No NO **If Yes, an Inspection shall be completed within ___ months.**

Inspector's Printed Name: GLENN DAVIS

Inspector's Signature: _____ **Date:** 4-30-12

STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES AND
ENVIRONMENTAL CONTROL
DIVISION OF WATER
89 KINGS HIGHWAY
DOVER, DELAWARE 19901

ENVIRONMENTAL
LABORATORY SECTION

PHONE: (302) 739-9942
FAX: (302) 739-3491

May 21, 2012

J. Chris Cleaver
DWR - Surface Water Discharge Section - NPDES
89 Kings Highway
Dover, DE 19901

Attention: J. Chris Cleaver

Attached you will find the following Laboratory Results:

Order Number:	1205012
Project Description:	Allen Family Foods
Date Received:	05/02/2012
Time Received:	13:30

If you have any questions regarding this data, please contact me at the above telephone number.

Sincerely,

Kathy A. Knowles
Laboratory Manager

Delaware's good nature depends on you!

Environmental Laboratory Section - Division of Water
Delaware Department of Natural Resources and Environmental Control
89 Kings Highway, Dover, DE 19901 Phone: 302-739-9942

ANALYSIS REPORT

ELS Sample Number:	1205012-001	***Matrix:***	Waste Water
Client Sample Description:	001	***Sampling Method:***	Composite
Site ID:		***Date and Time Collected:***	5/1/2012

Test Parameter	*Method*	*Result*	*Units*	*Qualifier*	*LOQ*	*Analysis Date*
Inorganic Nonmetallic Constituents						
Ammonia as N, Total	USEPA 350.1	0.262	mg/L		0.020	05/05/2012
Nitrogen, Total, Alkaline Persulfate	APHA 4500-P-J	26.2	mg/L		0.500	05/07/2012
Phosphorus, Total, Alkaline Persulfate	APHA 4500-P-J	0.150	mg/L		0.010	05/07/2012
Organic Aggregate Constituents						
BOD, 5-Day (Seeded)	APHA 5210-B	3.38	mg/L		2.40	05/02/2012
Physical and Aggregate Properties						
Residue, Nonfilterable (TSS)	APHA 2540-D	2	mg/L		2	05/03/2012

ANALYSIS REPORT

ELS Sample Number:	1205012-002	***Matrix:***	Waste Water
Client Sample Description:	001	***Sampling Method:***	Grab
Site ID:		***Date and Time Collected:***	5/2/2012 10:40

Test Parameter	*Method*	*Result*	*Units*	*Qualifier*	*LOQ*	*Analysis Date*
Aggregate Organic Constituents						
N-Hexane Extractable Material	EPA 1664	< 5.2	mg/L		5.2	05/08/2012
Microbiological Examination						
Enterococcus	USEPA 1600	2	cfu/100ml		2	05/03/2012

ANALYSIS REPORT

ELS Sample Number:	1205012-003	***Matrix:***	Waste Water
Client Sample Description:	001-1	***Sampling Method:***	Grab
Site ID:		***Date and Time Collected:***	5/2/2012 10:41

Test Parameter	*Method*	*Result*	*Units*	*Qualifier*	*LOQ*	*Analysis Date*
Microbiological Examination						
Enterococcus	USEPA 1600	1	cfu/100ml		1	05/03/2012

Environmental Laboratory Section - Division of Water
Delaware Department of Natural Resources and Environmental Control
89 Kings Highway, Dover, DE 19901 Phone: 302-739-9942

Qualifier Codes, Definitions, and Abbreviations

Qualifier/Flag

<	Sample value is below the method detection limit. The result is reported as < MDL.
>	Sample value is above the upper quantitation limit. The upper quantitation limit is reported.
AB	Air Bubble in DO bottle
B	The parameter was detected in the method blank at a concentration that was both above the LOQ and greater than 10% of the sample concentration.
BT	Secchi disk ON BOTTOM. The reported result is the depth from the surface to the bottom.
C	See report narrative or comment line for observations concerning this result.
D	Sample diluted for analysis.
FB	The parameter was detected in the field blank at a concentration that was both above the LOQ and greater than 10% of the sample concentration.
FZ	Samples frozen prior to analysis
I	The reported value is estimated due to the presence of interference.
IM	Instrument malfunctioned; No measurement reported.
J	Analyte present; reported value is estimated; concentration is below the range for accurate quantitation (greater than the MDL, but less than the LOQ).
JH	Result is likely overestimated due to matrix effect.
JL	Result is likely underestimated due to matrix effect.
LOQ	Limit of Quantitation
MDL	Method Detection Limit
N	This flag indicates presumptive evidence of a compound. This flag is only used for TICs, where the identification is based on a mass spectral library search and must be used in combination with the J flag. It is applied to all TIC results. For generic characterization of a TIC, such as chlorinated hydrocarbon, or for an "unknown" (no matches >= 85%), the "N" flag is not used.
NA	Not Analyzed but required by project workplan or analytical request form.
NBF	No bottom measurement recorded in the field due to shallow water; Bottom records are those measurements recorded at surface.
NC	Sample not collected, but required by the project work plan.
ND	Not Detected.
NE	Field measurement not taken due to uncontrollable field sampling event or Natural Condition (Depth of water too deep/shallow).
NF	Sample collected, but not analyzed by the laboratory due to field error.
NO	None Observed
NR	No Result. See report narrative or comments for explanation.
NV#	Analytical result not valid.
O	Sample outsourced for analysis. Data will be reported separately.
P	Sample not properly preserved in field in accordance with preservation requirements. Data may be suspect.
QC	Quality control value is outside acceptance limits.
QNS	Quantity not sufficient. Not enough sample to perform requested analyses.
S	Results will be reported in a separate report; See attached report.
SD	Sample discarded; Sample collected but not analyzed as per client request.
SNF	Site has no flow (i.e. a dry stream or a stream with no velocity)
STD	Stream too deep
STS	Site is too shallow to sample
TIC	Tentatively identified compound from a GC/MS library search.
U	Compound was analyzed but not detected. The method detection limit is reported.
UR	Unusual result. See narrative for an explanation.
USGS	USGS Gauge
V	Analysis performed after holding time expired.

Environmental Laboratory Section - Division of Water
Delaware Department of Natural Resources and Environmental Control
89 Kings Highway, Dover, DE 19901 Phone: 302-739-9942

Qualifier Codes, Definitions, and Abbreviations

Units

CFS	Cubic Feet per Second.
cfu/100mL	Colony forming units per 100 mL.
G	gram; there are 1000 g in 1 Kg.
GPM	Gallons per minute.
IN	Inches.
Kg	Kilogram.
L	Liter.
mg	milligram; there are 1000 mg in 1 g.
MGD	Millions of Gallons per Day.
ml	milliliter; there are 1000 ml in 1 L.
mpn/100mL	most probable number per 100 mL.
NTU	Nephelometric Turbidity Units. NTU is numerically equivalent to Formazin turbidity unit (FTU).
oC	Celsius.
pCi/L	Pico curie per liter.
ppb	Parts per billion=ug/Kg, ug/L.
ppm	Parts per million=mg/Kg, ug/g, mg/L, ug/ml; 1 ppm=1000 ppb.
su	Standard Units.
ug	microgram; there are 1000 ug in 1 mg.
uL	microliter; there are 1000 ul in 1 ml.
uMhos	Conductivity units for laboratory measurements.
uS	micro siemens; units used to measure conductivity in the field; same as uMhos.

Environmental Laboratory Section - Division of Water
Department of Natural Resources and Environmental Control
89 Kings Highway, Dover, DE 19901 (302) 739-9942

FIELD CHAIN OF COUSTODY

(Complete in BLUE ink)

Client : J. Chris Cleaver
Address : 89 Kings Highway
Dover, DE 19901
Phone No.: (302)739-9946

Report To : J. Chris Cleaver
Invoice To : J. Chris Cleaver
Account : NPDES
ELS Order ID : 1205012

PROJECT NAME Allen F.F.

SAMPLERS (Please Print) J. Chris Cleaver

(ELS Use Only) Lab Log No.	Client Sample Description	Sample Date	Sample Time	Matrix*	Comp	Grab	No. Of Containers	ANALYSES: TSS BOD	NH3/Phos N	Nitro	O+G					REMARKS
1205012-001	001	5.1	24HR	WW	✓		1	/	/							
1205012-002	001	5.2	1040	✓		✓	4			/	3					
1205012-003	001.1	5.2	1041	✓		✓	1			/						

RELINQUISHED BY: (signature)	DATE	TIME	RECEIVED BY: (signature)
C. Cleaver	5.2.12	1330	[signature]

DW - drinking water
ER - equip. rinseate
GW - ground water
Lab - lab water
LW - liquid waste
SE - sediment
SL - sludge
SO - soil
SW - surface water
TI - tissue
WS - solid waste
WW - waste water

COMMENTS:

BOD Cl2

pH 7.0

Is laboratory chain-of-custody required? (Yes) / No

ELS USE ONLY
Sample Conditions (circle response):
1. Samples match COC? (Yes)/No 2. Bottles supplied by ELS? (Yes)/No 3. Samples received broken/leaking? Yes/(No) 4. Cooler temp bottle 2-6 degrees? (Yes)/No/NA
5. Properly preserved? (Yes)/No 6. VOA/DO containers free of headspace? Yes/No/(NA) 7. Holding times expired? Yes/(No) 8. Volume sufficient for analysis? (Yes)/No

D-534

KWurck
04.23.12

State of Delaware
Department of Natural Resources &
Environmental Control
Division of Water
89 Kings Highway
Dover, Delaware 19901

Surface Water
Discharges Section

Phone: (302) 739-9946
Fax: (302) 739-8369

RECEIVED
APR 03 2012
SURFACE WATER

SECTION 4.04 REPORT

WASTEWATER TREATMENT FACILITY

NAME: Allen's Harbeson Wastewater Treatment Facility

ADDRESS: 18752 Harbeson Road, P.O. Box 63

Harbeson (CITY) | Delaware (STATE) | 19951 (ZIP)

OWNER INFORMATION

NAME: Allen Harim Foods, LLC.

RESPONSIBLE OFFICIAL: Scott Yackel, Plant Manager | TELEPHONE NUMBER: 302-684-1640

ADDRESS: 126 North Shipley Street

Seaford (CITY) | Delaware (STATE) | 19973 (ZIP)

TYPE OF PLANT OR TYPE OF UNIT PROCESSES OPERATED

Anoxic Ponds, Complete Mix Activated Sludge, Clarification, Chlorination, Dechlorination, Aerobic Digesters, Dissolved Air Flotation Thickeners, Belt Filter Press, Off site Pressed Sludge and DAF Sludge Disposal

PLANT SIZE

DESIGN FLOW: 1.25 (Permitted) MGD | AVERAGE DAILY FLOW: 0.60 (March. 2012) MGD

OPERATOR(S) IN DIRECT REASONIBLE CHARGE

Please attach additional sheet if necessary

Name	*Lic. #*	*Lic. Level*	*Area(s) of Plant Responsibility*
Michael R. Sause	522	Level 4	DRC Entire Plant

OTHER OPERATOR(S)

Please attach additional sheet if necessary

Name	*Lic. #*	*Lic. Level*	*Area(s) of Responsibility*
See attached sheet			

VERIFICATION

4-3-12
DATE

Michael R. Sause
SIGNATURE OF RESPONSIBLE OFFICIAL

RETURN TO: DNREC, ATTN: SWDS, 89 KINGS HIGHWAY, DOVER, DE 19901

Delaware's good nature depends on you!

HARBESON WASTEWATER PLANT STAFFING

Name	Title	Certification Level
Michael Sausé	Wastewater Manager (DRC Entire Plant)	DE Level 4 #522 ✓
Jeffrey Bailey	Wastewater Operator / Line Leader 1st shift (DRC)	DE Level 2 #395 ✓
Nancy Kraus	Wastewater Operator / Laboratory (DRC) 2nd shift	DE Level 1 #583 ✓
Robert Salensky	Wastewater Operator / 3rd shift (DRC)	DE Level 1 #708 ✓
Frantz Fan Fan	Wastewater Operator / 1st shift	DE Level 1 #757 OIT
Ernie Wroten	Biotech Plant Manager	

Provides overall management and maintenance support to the wastewater plant and staff

Roy Barger — Maintenance Manager

Provides overall management and maintenance support to the wastewater plant and staff.

Jason Reale — Corporate Project Engineer

Provides engineering and special project support to the wastewater plant and staff.

Areas of Responsibility

As Wastewater Manager Michael Sausé currently has Direct Responsible Charge (DRC) and overall management responsibility of the Harbeson Wastewater Treatment Facility. The operators cover three shifts, five days per week to oversee the operations and maintenance of the Harbeson wastewater facility to ensure permit compliance with discharge requirements. DRC status should be considered as noted above due to the level of responsibility on the shifts that each operator is responsible for. Processes include dissolved air flotation thickener, anoxic lagoons, complete mixed activated sludge, final clarification, chlorination, dechlorination, sludge digestion and belt filter press. Duties include, but are not limited to, operation of equipment, operation checks, process control checks, minor preventive and corrective maintenance, process laboratory testing, housekeeping, etc .

Non-Hazardous Liquid Waste Transporters Permit

Issued by: Groundwater Discharges Section
Division of Water Resources
Department of Natural Resources
and Environmental Control
89 Kings Highway
Dover Delaware 19901
302-739-9948

Enviro-Organic Technologies Inc
2323 Marston Rd
PO Box 600
New Windsor MD 21776

Permit Number: **DE OH-601**
Issue Date: 10/28/2008
Expiration Date: 10/27/2013

Pursuant to the provisions of 7 Del. C., Chapter 60, and the State of Delaware Department of Natural Resources and Environmental Control's Guidance and Regulations Governing the Land Treatment of Wastes, permission is hereby granted to Enviro-Organic Technologies Inc to operate and maintain the vehicle(s) listed in the permit application and any supplemental submissions to the Department, operated by Enviro-Organic Technologies Inc, for the purpose of collecting, transporting through Delaware and disposing of the non-hazardous liquid wastes listed in Condition 1 of this permit.

A copy of this permit must accompany each permitted vehicle and be presented upon request to any law enforcement officer or representative of the Department of Natural Resources and Environmental Control.

This permit is issued subject to the following conditions:

1. Disposal site(s) for all waste(s) transported shall be the following:
   a. Water residuals generated by United Water & Artesian Water and food processing residuals generated by Kraft to be disposed of in the state of Maryland.
2. Permittee shall maintain a current copy of their permit/authorization documentation for each facility listed in Condition 1 on file with the Department.
3. All receiving stations must be in compliance with all Federal, State and local regulations.
4. None of the wastes shall be deposited into ditches, watercourses, lakes, ponds, tidewater sources, landed property or at any point other than the disposal site(s) mentioned in Condition 1 above.
5. All waste material collected by permittee shall be transported and disposed of in accordance with the regulations of the Department of Natural Resources and Environmental Control and upon authorization by the disposal site(s) listed in Condition 1 above. None of these wastes may be disposed of within the State of Delaware without specific permission of the Department.
6. The company name, address and permit number shall be displayed on both sides of each vehicle used for hauling purposes in letters not less than three inches high and of a color contrasting the color of the vehicle.
7. Every vehicle used for waste transporting purposes shall be equipped with a leak-proof tank or body and shall be maintained in a clean and sanitary condition. All pumps, hoses, and vehicle tanks or bodies shall be maintained so as to prevent leakage. Provisions shall be made to discharge all liquid waste through a leak-proof hose from the tank compartment of the vehicle.
8. All waste transporting truck pumping and discharge hoses shall be fitted with automatic shut-off valves at the tank compartment of the vehicle(s).

Non-Hazardous Liquid Waste Transporters Permit

Issued by: Groundwater Discharges Section
Division of Water Resources
Department of Natural Resources
and Environmental Control
89 Kings Highway
Dover Delaware 19901
302-739-9948

Clean Delaware LLC
PO Box 123
Milton, DE 19968

Permit Number: **DE WH-013**
Issue Date: 9/26/2011
Expiration Date: 9/25/2016

Pursuant to the provisions of 7 Del. C., Chapter 60, and the State of Delaware Department of Natural Resources and Environmental Control's Guidance and Regulations Governing the Land Treatment of Wastes, permission is hereby granted to Clean Delaware LLC to operate and maintain the vehicle(s) listed in the permit application and any supplemental submissions to the Department, operated by Clean Delaware LLC, for the purpose of collecting, transporting through Delaware and disposing of the non-hazardous liquid wastes listed in Condition 1 of this permit.

A copy of this permit must accompany each permitted vehicle and be presented upon request to any law enforcement officer or representative of the Department of Natural Resources and Environmental Control.

This permit is issued subject to the following conditions:

1. Disposal site(s) for all waste(s) transported shall be the following:

   a. Septage and holding tank waste:

      i) The Inland Bays and/or South Coastal Regional Wastewater Treatment Facilities, Sussex County, Delaware
      ii) Clean Delaware Facility, Milton, Delaware
      iii) Kent County Sewer System at Pumping Station No. 1 (Smyrna) & Pumping Station No. 8 (Little Heaven), Kent County, Delaware

   b. Grease trap waste and portable toilet waste:

      i) Kent County Sewer System at Pumping Station No. 1 (Smyrna) & Pumping Station No. 8 (Little Heaven), Kent County, Delaware

   c. Holding tank waste from the Windstone, Shoreview Woods, Anthem and Holland Mills, and the Reserves at Lewes Landings subdivisions:

      i) The Beaver Creek Regional Wastewater Treatment Facility
      ii) The Stonewater Creek Regional Wastewater Treatment Facility
      iii) The Heron Bay Regional Wastewater Treatment Facility
      iv) The Milton Water Reclamation Facility
      v) The Ridings of Rehoboth Wastewater Treatment Facility
      vi) The Retreat Wastewater Treatment Facility

   d. For stabilized biosolids generated in the treatment of wastewater in Delaware; and lime stabilized septage, holding tank waste and other minor wastewater treatment residuals treated under State Permit LTS 4002/96S:
      i) In accordance with Agricultural Utilization Permit # AGU 0021/92C:
         (a) TheMilton site, located on Route 30 and 16;
         (b) The Harbeson site, located on the south side of Route 9, east of Route 5

TAI Engineers, Managers & Technical Services

INSTRUMENT CALIBRATION RECORD for Non GMP facilities

UUT ID-Number / Tag Number	TAI Job Number	Site	Site Contact
EFF-FLOW RECORDER	Y11-0867	ALLEN HARMIN HARBESON, DEL	MIKE SAUSE
Manufacturer	**Model No.**	**Serial Number**	**Description**
HONEYWELL INSTRUMEN	TRUELINE DRA45AT-1100	0703Y7730719000001	CHART RECORDER
Instrument Class	**Calibration Procedure**	**Department/Location**	**Calibration Range**
CRITICAL	STD 7.4.17	WASTE WATER EFFLUENT FLOW RECORDER	0 TO 1200 GPM 30 INCHES TO 18 INCHES
Manufacturer's Accuracy	**Calibration Tolerance**		
-/+ 0.25% of Max Range	-/+ 1.0% of F/S		

Initial Cal ☐	Scheduled Cal ☒	Unscheduled Cal ☐	See Comments ☐	0.1	YEARLY

ID-Number	Model No.	Description	Due Date	Accuracy
			\	

Units		As-Found Readings			As-Left Readings		
Standard	UUT	Standard	UUT	Deviation	Standard	UUT	Deviation
INCHES	GPM	30	0.0	0.0	30	0.0	0.0
INCHES	GPM	27	300.0	0.0	27	300.0	0.0
INCHES	GPM	24	600.0	0.0	24	600.0	0.0
INCHES	GPM	21	900.0	0.0	21	900.0	0.0
INCHES	GPM	18	1200.0	0.0	18	1200.0	0.0

IN ☒	O-C-T ☐	O-P-T ☐	INOP ☐	N/A ☐	Calibrated ☒	Limited Cal ☐	Out of Service ☐	N/A ☐

☐ N/A WHILE CHECKING THE ULTRASONIC FLOW . I ALSO CHECKED THE RECORDER FOR ACCURACY AT SAME TIME.

Calibrated By / Signature	Date Calibrated	Date Due
EARLE BOOTHE	08 NOV 11	NOV 2012
Reviewed By: Neal E. Neals	**Position:** Industrial Div. Manager	

609 Barkwood Court, SUITE K • Linthicum, MD 21090 • Tel (410) 789-2407

TAI Engineers, Managers & Technical Services

INSTRUMENT CALIBRATION RECORD for Non GMP facilities

UUT ID-Number / Tag Number	TAI Job Number	Site	Site Contact
LAB-pH	Y11-0667	ALLENS FOOD HARBESON DEL	MIKE SAUSE
Manufacturer	**Model No.**	**Serial Number**	**Description**
OAKTOW	ION 510 SERIES	283911	Ph METER
Instrument Class	**Calibration Procedure**	**Department/Location**	**Calibration Range**
CRITICAL	STD 7.4.10	WASTE WATER LAB	0.00 TO 14.00 pH
Manufacturer's Accuracy	**Calibration Tolerance**		
-/+ 0.01pH	-/+ 0.02 pH		

Initial Cal ☒ Scheduled Cal ☐ Unscheduled Cal ☐ See Comments ☒ | 0.01 | YEARLY

ID-Number	Model No.	Description	Due Date	Accuracy
CAT#BDH5046-500	LOT#2002140	pH BUFFER SOLUTION 7.00	JAN 2012	-/+ 0.01pH
CAT#BDH5018-500	LOT#2002035	pH BUFFER SOLUTION 4.00	JAN 2012	-/+ 0.01pH
STOCK 40477	LOT#7AL214	pH BUFFER SOLUTION 10.00	DEC 2009	-/+ 0.01pH

Units		As-Found Readings			As-Left Readings		
Standard	UUT	Standard	UUT	Deviation	Standard	UUT	Deviation
pH	pH	4.00	3.93	0.07	4.00	4.00	0.00
pH	pH	7.00	7.17	0.17	7.00	7.00	0.00
pH	pH	10.00	9.99	0.01	10.00	10.00	0.00

IN ☐ O-C-T ☒ O-P-T ☐ INOP ☐ N/A ☐ | Calibrated ☒ Limited Cal ☐ Out of Service ☐ N/A ☐

☐ N/A CLIENT SUPPLIED 10.00 BUFFER SOLUTION. THIS WAS ONLY USED FOR A pH BUFFER CHECK NOT USED FOR CALIBRATION.

Calibrated By / Signature	Date Calibrated	Date Due
EARLE BOOTHE	01 NOV 11	NOV 2012
Reviewed By:	**Position:**	
[signature]	Industrial Div. Manager	

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TAI Engineers, Managers & Technical Services

INSTRUMENT CALIBRATION RECORD for Non GMP facilities

UUT ID-Number / Tag Number	TAI Job Number	Site	Site Contact
EFF-FLOW	Y11-0887	ALLEN HARMIN HARBESON, DEL	MIKE SAUSE
Manufacturer	**Model No.**	**Serial Number**	**Description**
SIEMENS INSTRUMENT	HYDRORANGER 200	PBD/X6170036	ULTRASONIC FLOW METER
Instrument Class	**Calibration Procedure**	**Department/Location**	**Calibration Range**
CRITICAL	STD 7.4.17	WASTE WATER EFFLUENT FLOW	0 TO 1200 GPM 30 INCHES TO 18 INCHES
Manufacturer's Accuracy	**Calibration Tolerance**		
-/+ 0.25% of Max Range	-/+ 1.0% of F/S		

Initial Cal ☐	Scheduled Cal ☒	Unscheduled Cal ☐	See Comments ☐	0.1	YEARLY

ID-Number	Model No.	Description	Due Date	Accuracy

Units		As-Found Readings			As-Left Readings		
Standard	UUT	Standard	UUT	Deviation	Standard	UUT	Deviation
INCHES	GPM	30	0.0	0.0	30	0.0	0.0
INCHES	GPM	27	300.0	0.0	27	300.0	0.0
INCHES	GPM	24	600.0	0.0	24	600.0	0.0
INCHES	GPM	21	900.0	0.0	21	900.0	0.0
INCHES	GPM	18	1200.0	0.0	18	1200.0	0.0

IN ☒ O-C-T ☐ O-P-T ☐ INOP ☐ N/A ☐ | Calibrated ☒ Limited Cal ☐ Out of Service ☐ N/A ☐

☐ N/A THE CHECKING OF THE FLOW WAS DONE BY MEASURING FROM THE TOP OF WALL TO THE WATER INSIDE OF CHANBER WHICH GAVE ME THE LEVEL IN INCHES WHICH INTURN CONVERTED TO GPM.

Calibrated By / Signature	Date Calibrated	Date Due
EARLE BOOTHE	08 NOV 11	NOV 2012
Reviewed By: Neal E Mills	Position: Industrial DN. Manager	

909 Barkwood Court, SUITE K • Linthicum, MD 21090 • Tel (410) 789-2407

STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES &
ENVIRONMENTAL CONTROL
DIVISION OF WATER
89 KINGS HIGHWAY
DOVER, DELAWARE 19901

Surface Water Discharges Section

Phone: 302-739-9946
Fax: 302-739-8369

Certified Mail # 7006 3450 0003 3848 4690
Return Receipt Requested

June 4, 2012

Allen's Harim Foods, LLC
Mr. Mike Sause' – Wastewater Manager
18752 Harbeson Road
P.O. Box 63
Harbeson, DE 19951

Re: **Manager's Deficiency Warning Letter** and Inspection Summary
Compliance Sampling & Inspection (CSI) – April 30, 2012
NPDES Permit No. DE-0000299

Dear Mr. Sause':

On behalf of the State of Delaware, Surface Water Discharges Section, Compliance Branch, I would first like to thank you, Jeff Bailey, Jason Reale, Henry Quathamer, LouAnn Parson, and your associates for the cooperation and assistance given to Nicole Smith and myself, during the Compliance Sampling & Inspection (CSI) completed at your facility on April 30, 2012.

Laboratory records, reagents, instrumentation, and methods were reviewed for conformance to NPDES requirements, and were found to be in accordance with these requirements. Overall WWTP operation, plant housekeeping, and solids handling were very good and your operators were very cooperative, very helpful, and very knowledgeable. During this CSI, the Discharge Monitoring Report and support data was checked for the month of November 2011, and all data was found to be order and traceable to raw data.

The Storm Water Pollution Prevention and SPCC Plans were reviewed, and all inspections and training were documented. Last revision/review for both plans was completed in December 2011. Allen's Harim personnel have designed (and soon to be installed) a sampling area for their storm water outfall that will allow for safe sampling during storm events. Allen's Harim personnel must insure that qualifying storm events are properly sampled when there is discharge; if no discharge, documented evidence must exist that can verify that there was no discharge of storm water from the facility.

During this CSI, the following deficiencies/observations were noted:

- Found that buffers used for pH calibration had exceeded their expiration date. Allen's Harim personnel immediately replaced the old buffers with new stock (they knew that date was close and had ordered new buffer . . . but failed to check recently and replace.
- The potential for storm water discharges at Outfalls 002 and 003 was again discussed, and it was noted that the monthly Discharge Monitoring Reports (DMR's) are always checked as "No Discharge" for both outfalls. Allen's Harim Foods was able to produce only minimal documented evidence that these storm water outfalls never had any discharge; if there were inspections of these outfalls before, during, or after rain events, there was little or no written documentation that any inspections had been completed. An inspection sheet is required, that will require operators, supervisors, and/or managers to sign-off on an actual outfall inspection before, during, and after any rain event to document any discharge or non-discharge. If there is discharge, Part IB.2 of your NPDES permit requires that this discharge must be sampled within the conditions specified, and analyzed for the parameters indicated.
- The ground areas around the "Live Hold" station are not blacktopped and are only stoned. During any heavy rain event or in the case where a sump may plug up or become inoperable in this area, runoff rain water will travel over the stoned area prior to being collected at the 002 or 003 Outfall sumps. There is a strong potential for this run-off from the Live Hold area to be highly contaminated, and is being absorbed into the stoned area and into the ground. DNREC personnel from the Surface Water Discharges Section will be in contact with representatives from Allen's Harim Foods, LLC to discuss sampling of any run-off water coming from this live hold area, and the potential for contamination of the ground water. It is highly recommended that the areas around the live hold section are blacktopped to allow the storm water that may be contaminated to be able to flow directly to the 002 and/or 003 sumps for pumping to the treatment plant, and eliminate this potential for contamination to the ground water.
- It was again noted during this inspection, that the old "Anaerobic Pond" is no longer used as part of the Process Wastewater Treatment Plant, and is basically just being used as a permanent storage lagoon (surface impoundment). It is obvious that the pond liner is in disrepair and "bubbling up and surfacing" in many areas . . . most likely from trapped anaerobic gasses, and at times there is a real odor issue. Allen's Harim Foods, LLC cannot continue to utilize this surface impoundment as a permanent storage facility for poultry process and sanitary waste. Please reference the attachment to this letter, which shows some highlighted regulations from Title 7 Natural Resources & Environmental Control, Delaware Administrative Code, 7103 Guidance and Regulations Governing the Land Treatment of Wastes; these areas address sludge storage and the requirement for a sludge storage permit . . . etc.
- Operations & Maintenance Manuals (individual) are available for the equipment utilized in the Wastewater Treatment Plant, however, nothing is very organized and extremely hard to document. The plant must develop a systematic and formal Operations and Maintenance Manual that is reviewed on a regular basis, and contains documented evidence that the manual is being reviewed/updated, and approved. This item has been discussed during several annual inspections, and must be addressed.

The Surface Water Discharges Section is attempting to gain voluntary compliance in accordance with 7 Del.C. § 6019. Please send your formal written response, including any corrective/preventative actions to the above noted deficiencies, by no later than 30 days after receiving this letter. The formal written response must be mailed to my attention at Delaware-DNREC, Division of Water, Surface Water Discharges Section, Compliance & Enforcement Branch, 89 Kings Highway, Dover, DE 19901.

On behalf of the State of Delaware, Surface Water Discharges Section, Compliance & Enforcement Branch, I would again like to thank you, and everyone at the Allen's Harim Foods, LLC, Harbeson, Delaware Plant, for the cooperation and participation in this Compliance Sampling Inspection program to help assure the continued quality of NPDES effluent waters and the self-reporting data. If you have any questions, please contact me at 302-739-9946.

Sincerely,

Glenn F. Davis
Program Manager
Surface Water Discharges Section
Compliance & Enforcement Branch
State of Delaware – DNREC

ecopy: Mr. Robert Underwood – DNREC
Ms. Nicole Smith – DNREC

From **TITLE 7 NATURAL RESOURCES & ENVIRONMENTAL CONTROL DELAWARE ADMINISTRATIVE CODE - 7103 Guidance and Regulations Governing the Land Treatment of Wastes**

146.1.1 A facility is a temporary facility if it exists for less than one (1) year or it is used for storage for less than six (6) months in any one year.
146.1.2 A facility is a permanent facility if it is not a temporary facility.
146.0 General Requirements.

Adequate storage capacity for sludge is recognized as an integral and necessary element of
an acceptable sludge management program. Storage facilities are to be used as proactive
staging areas for sludge or sludge products and not to be used for final or permanent disposal.
Storage facilities used in a manner that constitutes final or permanent disposal shall be classified a surface disposal unit and subject to the requirements of The Regulations Governing the Disposal of Solid Waste in Delaware.

148.0 Permanent Storage Facilities.
Permanent storage facilities shall be designed and constructed in accordance with all the requirements listed for temporary storage facilities in these regulations with the following additions:

148.1 The facility shall be lined to prevent loss of materials to ground waters. Acceptable liners shall include:
148.1.1 1-foot thick clay or other suitable material with an installed permeability of 1.0 x 10-7 cm/sec. or less;
148.1.2 2-foot thick clay or other suitable material with an installed permeability of 1.0 x 10-6 cm/sec or less;
148.1.3 2-foot thick compacted soil with an installed permeability of 1.0 x 10-5 cm/sec. or less in combination with an artificial liner at least 30 mil in thickness with a permeability of 1.0 x 10-7 cm/sec. or less; or
148.1.4 Other manufactured facilities including but not limited to asphalt or reinforced concrete structures, steel tanks, fiberglass tanks, or their equivalent.
148.2 A ground water monitoring program shall be conducted in accordance with a plan approved by the Department. At a minimum, three wells, one upgradient and two downgradient of the facility, shall be installed. The Department may waive this provision for facilities which store sludge in above ground manufactured facilities such as tanks or similar structures.
148.3 The Department may approve the storing or stockpiling of dried sludge on a storage pad without groundwater monitoring if the pad meets the Department's standards for permanent storage facility liners and all runoff from the pad is collected and disposed of in a manner approved by the Department.
148.4 Other methods of storing or stockpiling dried sludge may be approved by the Department if the Department determines that they do not have significant potential to cause nuisances or adversely affect the public health or the environment.
148.5 If the facility is constructed after the date when these regulations are adopted by the Department a 1,000 foot buffer zone shall be maintained between the sludge processing or storage area, or both, and the nearest inhabited off-site dwelling. This buffer distance may be reduced if the Department considers that the facility has adequate specific conditions to control odors and potential nuisances.

Allen Harim Foods, LLC
Harbeson, Delaware Plant
Annual Compliance Sampling and Inspection
April 30, 2012

On Monday, April 30, 2012, Glenn Davis and Nicole Smith of the State of Delaware, Department of Natural Resources and Environmental Control, Division of Water, Surface Water Discharges Section, Compliance & Enforcement Branch, completed a Compliance Sampling and Inspection of the Allen Harim Foods, LLC, Harbeson Wastewater Treatment Plant (WWTP). Glenn Davis is the Environmental Program Manager I for the Compliance & Enforcement Branch, and Nicole Smith is the Senior Environmental Compliance Specialist for the same Branch.

The inspection team arrived at the Harbeson, Delaware facility at approximately 0920 hrs., presented their identification to the security guard on duty, and informed them that they were here to see Mr. Michael Sause', for the purpose of completing an inspection of the Wastewater Treatment Plant. After receiving visitor ID badges, Mr. Sause' accompanied the inspection team down to the WWTP, where they met with Mr. Jason Reale (Corporate Project Engineer), Mr. Henry Quathamer (Maintenance/Engineering Manager), Ms. Lou Ann Parson (President, BPEnvironmental, Inc.), and Mr. Jeff Bailey (WWTP Senior Operator). After a short pre-inspection meeting, the inspection team made a thorough inspection of the entire WWTP and included a review of the facility's storm water management practices.

WWTP Process

The Harbeson, Delaware Plant is a poultry processing plant that utilizes an activated sludge process, with anoxic/oxic ponds, clarifiers, dissolved air floatation (DAF), filter press, chlorination, and dechlorination. The Harbeson Plant is currently operating only one shift per day, and is processing approximately 110,000 birds per day. Poultry processing wastewater is pumped to the DAF where first stage solids are removed and sent to a holding tank. These solids are removed by Enviro Organic Technologies (EOC) for recycling in by-products. Effluent from the DAF is treated with Magnesium Oxide for alkalinity control and is then pumped to two (2) "Anoxic Ponds" (1.5 million gallons each), where it goes through a series of aeration/no aeration for nutrient removal and first stage organic reduction. Sanitary waste from the production facility is also pumped directly to the "Anoxic Ponds" and is co-mingled with the poultry processing wastewater.

From the "Anoxic Ponds", the wastewater flows to a Complete Mix Activated Sludge (CMAS) Tank #1 that has a capacity of approximately 1.6 M gallons. From CMAS #1, the activated sludge is gravity fed to CMAS #2 and is treated with Aluminum Chloride during the transfer for phosphorus removal. Flow is then gravity fed to the Circular Clarifier (polymer is added between CMAS #2 and the Clarifier to aide in solids settling). Effluent from the Circular Clarifier then goes to an old rectangular clarifier for further solids settling and then to the concrete labyrinth style chlorine contact chamber. Metered Sodium Hypochlorite is used for disinfection (chlorination) and Sodium Bisulfite is used for dechlorination.

Waste Activated Sludge (WAS) from the clarifiers is sent to two (2) Aerobic Digesters. After settling/decanting, the sludge from the Aerobic Digesters is pumped to a sludge filter press for processing. Filtrate from the filter press operation is sent to the "Anoxic Ponds" for treatment, and the sludge cake is picked up by Clean Delaware, Incorporated (CDI) and land applied (by permit). Sludge hauling permits for EOC and CDI were both documented and confirmed. Treated and disinfected water from the treatment process is discharged via Outfall 001 to Beaver Dam Creek which discharges to the Broadkill River.

Storm Water Pollution Protection

Allen Harim Foods, LLC does maintain an approved Storm Water Pollution Protection Plan; last update/review was December, 2011. Inspections, training, and Best Management Practices (BMP's) were reviewed and documented. There have not been any reportable spills in the past year, and all chemical and oil tank storage was found to be acceptable (no evidence of any spillage or problems), and most drum/tote storage is inside or under cover.

Outfall 002 & Outfall 003 are located just outside of the "Live Hold" Area (area where the birds remain in their transporting cages and on the flatbed trailer until processing is ready to move them into the production queue). Storm water runoff from the area around the live hold area flows to each of these two permitted storm water outfalls where it is captured in a sump and pumped to the "Anoxic Ponds" for treatment through the WWTP. The live hold area has a slanted concrete floor that contains two (2) collection sumps that pump to the Outfall 3 sump area (and ultimately to the "Anoxic Ponds"). The area in and around the live hold area is a stoned area, and any rain water that runs over this stoned area can seep down into the ground . . . this runoff water can and does contain contamination from chicken manure and other contaminants from the moving around of the trucks, flatbeds, and cages filled with chickens, and can find its way to the ground through the stoned areas. There have also been occasions when the sump pumps for Outfall 002 and 003 have been overwhelmed during very heavy rain events, and there has been discharge from these outfalls. These events have been few and far between, but no sampling (as required by their NPDES permit) has occurred. Sampling has not happened because area where sampling could occur is unsafe for personnel. Allen Harim Foods, LLC has been working to redesign the runoff pattern and install rip-rap and a sampling configuration to allow for future sampling on the occasion of a discharge. Both Outfalls 002 and 003 are properly identified with signage, and there was no flow at the time of the inspection. All collection areas were clear and clean of any trash and debris.

Outfall 004 is an area that basically collects all rain water runoff from the large parking lots and outside areas of the buildings. At the back of the property a concrete retaining wall with a weir utilized for storm water runoff flow control and to assure that any blown-around trash does not exit the outfall area. The area was clean with no debris present at the outfall site or at the catch

basin area. There was no flow from this outfall at the time of the inspection and the outfall was well identified with signage.

Spill Prevention Control & Countermeasures Plan (SPCC)

The Allen Harim Foods, LLC Harbeson, Delaware facility does maintain an SPCC Plan on site and the plan was last updated and reviewed in December, 2011. Inspections, training, and Best Management Practices (BMP's) were reviewed and documented. There have not been any reportable spills in the past year, and all chemical and oil tank storage was found to be acceptable (no evidence of any spillage or problems), and most all drum storage is inside or under cover.

General

It was noted that the facility has a beneficial reuse in place for approximately 20% of the treated wastewater from the WWTP. The reuse water is used for wash down of floors and various "Industrial Water" uses throughout the plant. The wash water is recovered and sent back through the WWTP for treatment.

There is a large lagoon in the back of the property that is available in case of an extreme emergency, where the WWTP can redirect the treated effluent to this lagoon. This lagoon currently has some rain water in it, but nothing is piped or directed to the lagoon . . . basically just "Rain From The Sky" and whatever rain water may runoff from the surrounding wooded area.

The inspection team completed a detailed check of the Discharge Monitoring Report (DMR) for November, 2011. All data was checked back to the raw laboratory data, and all calculations were verified. All testing methods, holding times, preservations, and container types were verified as conforming to 40 CFR Part 136. Found the MAX pH reported was off by 0.1 units, however, this did not affect compliance to the effluent limitations for the outfall.

Per the inspection team's request, Michael Sause' took samples of the plant effluent (Outfall 001) at a point following chlorination, but just prior to adding the dechlor chemical (Sodium Bisulfite) and at the discharge point following the Parshal Flume. Both of these samples were analyzed for Total Residual Chlorine. The sample prior to dechlorination analyzed at 1.0 mg/l and the discharge sample analyzed at non-detectable (ND); the effluent limitation is ND. The DPD chemical packets used in the TRC testing had an expiration date of July 2015. Also had Mr. Sause' test the discharge sample for pH, and the analysis was reported as 7.27; well within the permit limitation of 6.0 – 9.0 standard units.

Violations/Observations/Recommendations

- Found that buffers used for the pH meter calibration had exceeded their expiration date. Allen Harim personnel immediately replaced the old buffers with new stock (they knew that date was close and had ordered new buffer . . . but failed to check recently and replace.
- The potential for storm water discharges at Outfalls 002 and 003 was again discussed, and it was noted that the monthly Discharge Monitoring Reports (DMR's) are always checked as "No Discharge" for both outfalls. Allen Harim Foods was able to produce only minimal documented evidence that these storm water outfalls never had any discharge; if there were inspections of these outfalls before, during, or after rain events, there was little or no written documentation that any inspections had been completed. The processing plant is only working one shift during the week and no activity at the WWTP during the weekend. As a result, if there are any rain events during the weekend, the facility relies strictly on the automatic floats and pumps to ensure that storm water at Outfalls 002 and 003 is pumped to holding tanks. If the facility is going to claim no discharge from any outfall, there must be documented evidence to that effect. An inspection sheet is required, that will require operators, supervisors, and/or managers to sign-off on an actual outfall inspection before, during, and after any rain event to document any discharge or non-discharge. If there is discharge, Part IB.2 of their NPDES permit requires that this discharge must be sampled within the conditions specified, and analyzed for the parameters indicated.
- The ground areas around the "Live Hold" station are not blacktopped and are only stoned. During any heavy rain event or in the case where a sump may plug up or become inoperable in this area, runoff rain water will travel over the stoned area prior to being collected at the 002 or 003 Outfall sumps. There is a strong potential for this run-off from the Live Hold area to be highly contaminated, and is being absorbed into the stoned area and into the ground. DNREC personnel from the Surface Water Discharges Section will be in contact with representatives from Allen Harim Foods, LLC to discuss sampling of any run-off water coming from this live hold area, and the potential for contamination of the ground water. It is highly recommended that the areas around the live hold section are blacktopped to allow the storm water that may be contaminated to be able to flow directly to the 002 and/or 003 sumps for pumping to the treatment plant, and eliminate this potential for contamination to the ground water.
- It was again noted during this inspection that the old abandoned "Anaerobic Lagoon" is no longer used as part of the Process Wastewater Treatment Plant, and is basically just being used as a permanent storage lagoon (surface impoundment). It is obvious that the lagoon liner is in disrepair and "bubbling up and surfacing" in many areas . . . most likely from trapped anaerobic gasses, and at times there is a real odor issue. Allen Harim Foods, LLC cannot continue to utilize this surface impoundment as a permanent storage facility for poultry process and sanitary waste.

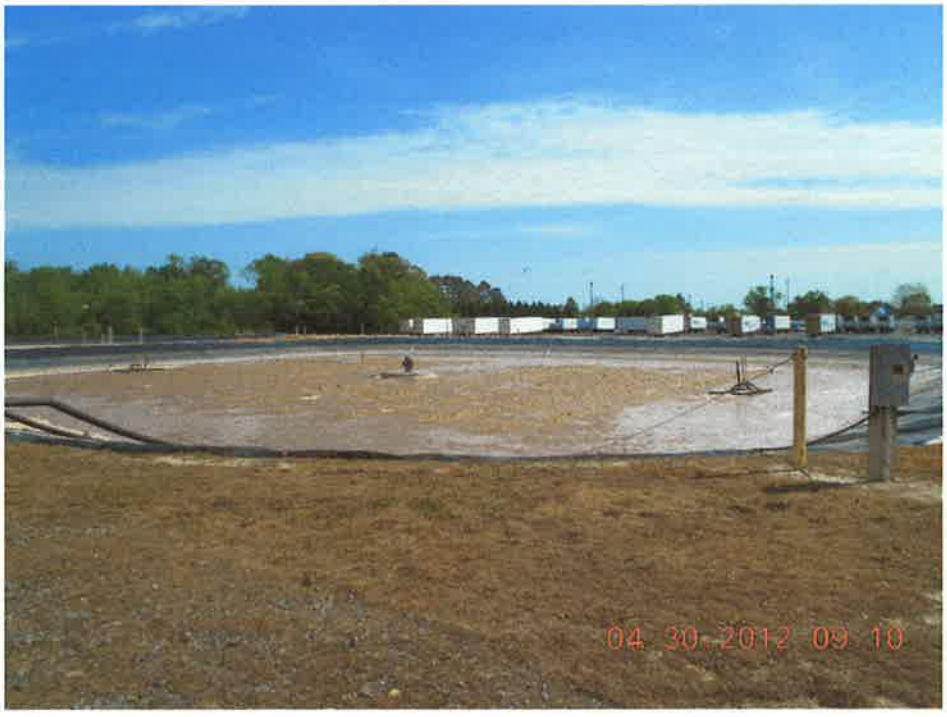
- Operations & Maintenance Manuals (individual) are available for the equipment utilized in the Wastewater Treatment Plant, however, nothing is very organized and extremely hard to document. The plant must develop a systematic and formal Operations and Maintenance Manual that is reviewed on a regular basis, and contains documented evidence that the manual is being reviewed/updated, and approved. This item has been discussed during several annual inspections, and must be addressed.

A closing meeting was held with all parties involved in the compliance inspection, and a review of the preliminary findings and recommendations was completed. Informed Mr. Sause' that I would be sending him an inspection follow-up letter that would detail any deficiencies noted, and the time table for action items. The Surface Water Discharges Section will first attempt to gain voluntary compliance in accordance with 7 Del.C. § 6019.

Departed facility at approximately 1510 hrs.

Glenn F. Davis
Program Manager I
Delaware – DNREC
Division of Water
Surface Water Discharges Section
Compliance & Enforcement Branch

Dissolved Air Floatation



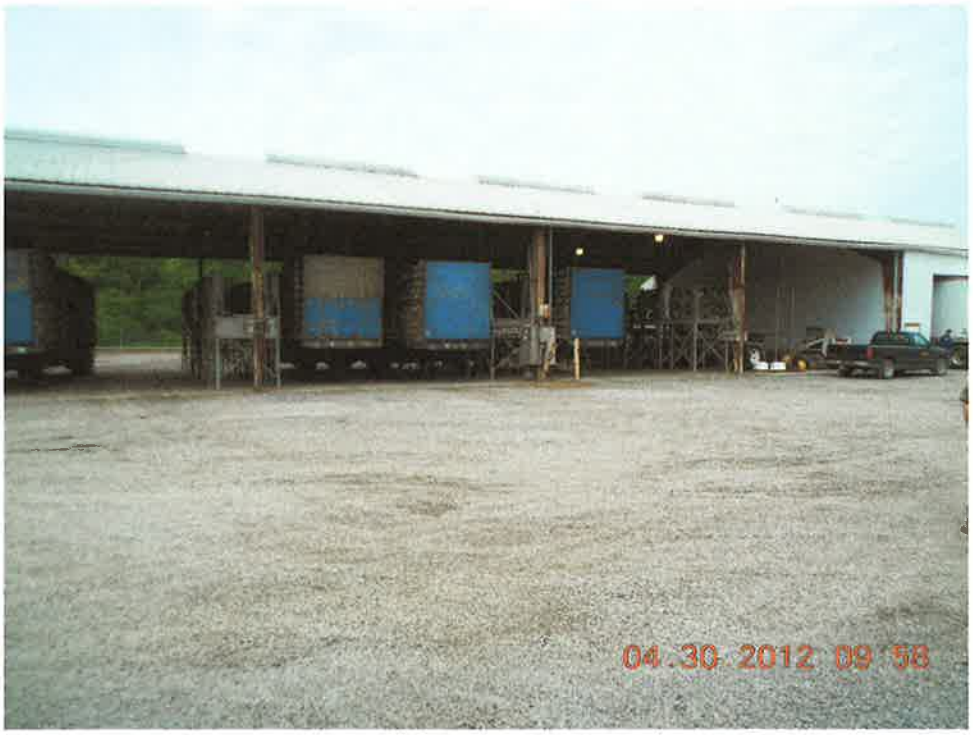
"Anoxic Pond"

Complete Mix Activated Sludge "CMAS" Unit No. 1

CMAS Unit No. 2 (Clarifier in background)

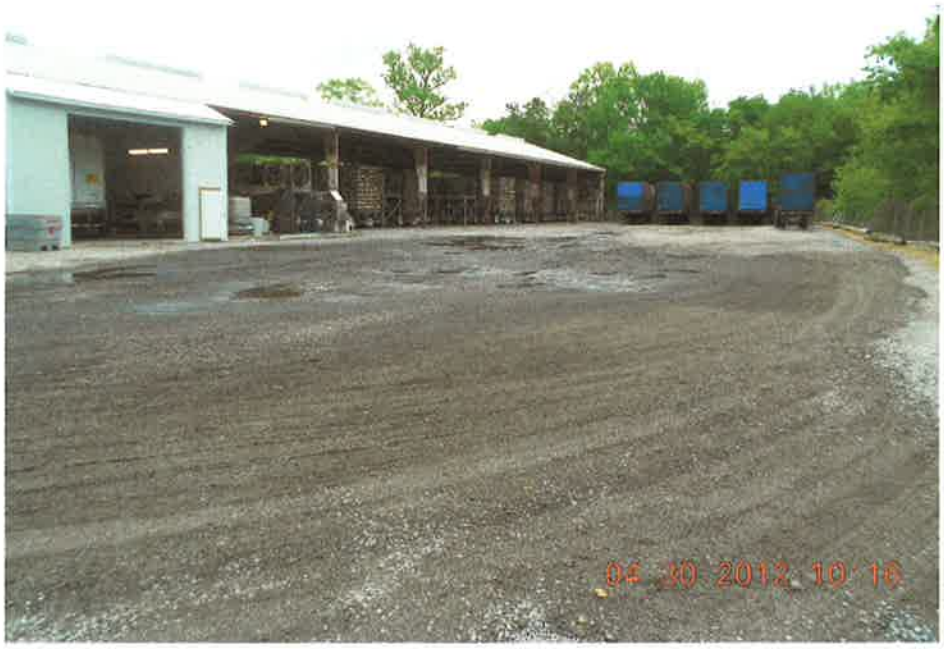
CMAS Unit No. 2 and Clarifier

Unused Emergency Diversion Lagoon



Live Hold Area – note stoned area

Live Hold Area



Live Hold Area

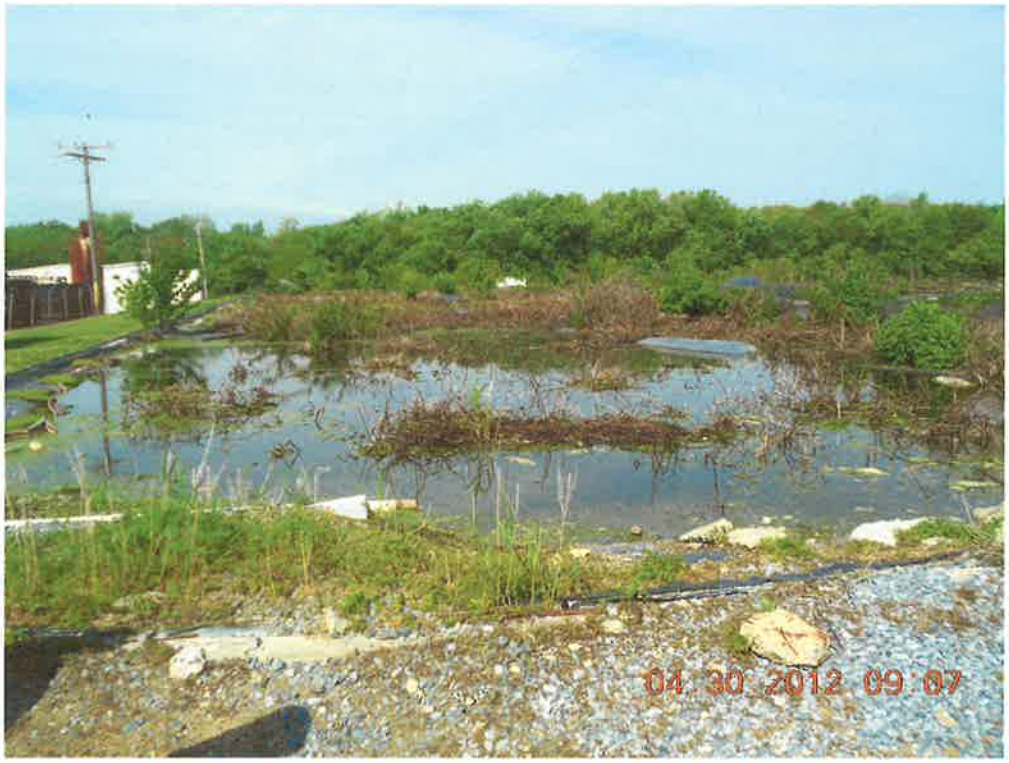
Live Hold Area

Storm Water Outfall 002

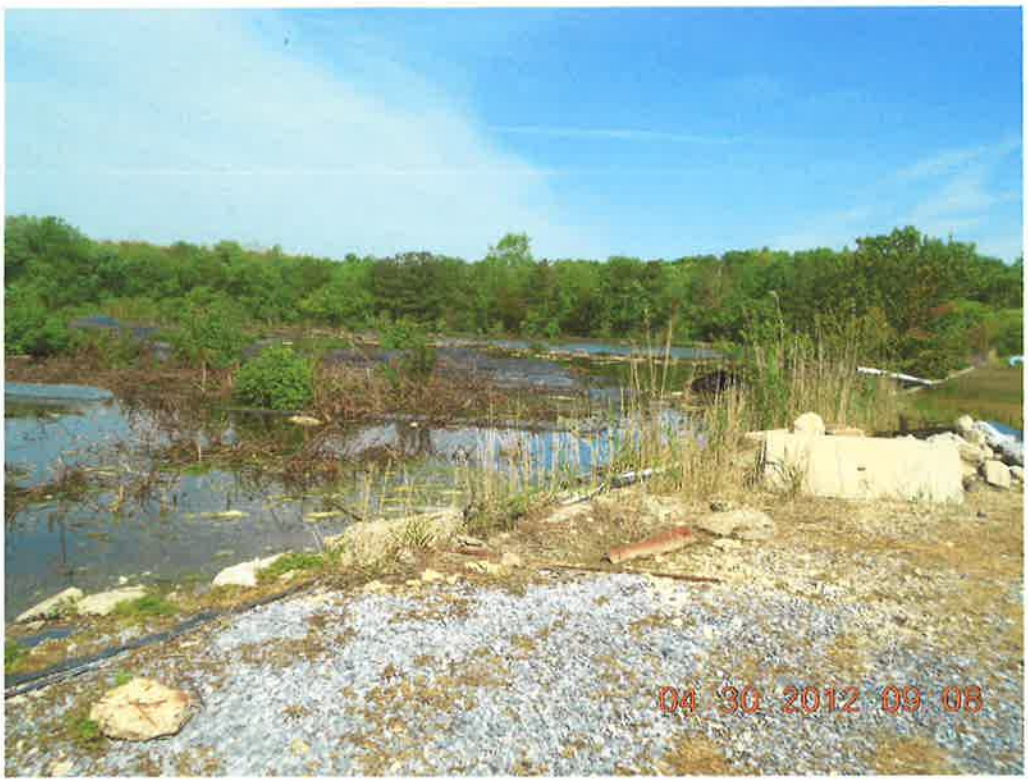
Storm Water Outfall 004 (note concrete retaining wall & wier – top left)

Chlorine Contact Chamber

Parshal Flume (Outfall 001)



Abandoned Anaerobic Lagoon



Abandoned Anaerobic Lagoon